



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 6, 2016

CHAIRMAN RANAE LENTZ, TREASURER  
OHIO REPUBLICAN PARTY STATE CENTRAL  
& EXECUTIVE COMMITTEE  
211 S. FIFTH STREET  
COLUMBUS, OH 43215

**Response Due Date**  
**04/13/2016**

IDENTIFICATION NUMBER: C00162339

REFERENCE: FEBRUARY MONTHLY REPORT (01/01/2016 - 01/31/2016)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 7 item(s):

1. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedules B and H4, supporting Lines 21(b) and 21(a), to clarify the following descriptions: "BAN" and "POLITICAL CONSULTING-NOT CANDIDATE SPECIFIC." (11 CFR § 104.3(b)(3) and 104.10(a)(4))

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at: [http://www.fec.gov/law/policy/purposeofdisbursement/inadequate\\_purpose\\_list\\_3507.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf)

2. Please amend your report by providing the purpose for each disbursement itemized on Schedules B and H4, supporting Lines 21(b) and 21(a). (11 CFR § 104.3(a)(4) and 104.10(4))

3. Schedule B of your report discloses reimbursements to individuals for "REIMBURSEMENT- SEE BZ 1/16-NOT CANDIDATE SPECIFIC," "REIMBURSEMENT- SEE EG 1/16- NOT CANDIDATE SPECIFIC," "REIMBURSEMENT- SEE EH 1/16-NOT CANDIDATE SPECIFIC," and "REIMBURSEMENT- SEE JP 1/16 NOT CANDIDATE SPECIFIC." Please be advised that when itemizing reimbursements to individuals for goods or

OHIO REPUBLICAN PARTY STATE CENTRAL & EXECUTIVE COMMITTEE

Page 2 of 4

services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

4. Schedule B supporting Line 21(b) of your report discloses payments made to credit card companies. Payments made to credit card companies must identify in memo entries, the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each payment as required by 11 CFR §104.9(b) and clearly identify on the Schedule B, which credit card payment each memo entry relates to.

5. On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the Activity or Event Identifier and the Allocated Activity or Event category code. Note that the activity or event identifier is not considered an adequate description of purpose. Please amend your report to include this missing information. (11 CFR §§104.10(b)(4) and 104.17(b)(3))

6. Schedule H4 supporting Line 21(a) of your report discloses payments for "INSURANCE PREMIUM-STAFF" and "PAYROLL, TAXES & FEES-NOT CANDIDATE SPECIFIC." Please be advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on Federal Election Activity (FEA) or activities in connection with a Federal election must not be allocated between or among federal and non-federal accounts. Rather, only federal funds may be used. Further, the Commission concluded in Advisory Opinion 2003-11 that amounts spent for employee-specific "fringe benefits," consisting of health insurance, disability insurance, life insurance, retirement benefits and payroll taxes, fall into the category of compensated time.

Please clarify whether this activity is for employees who spent 25% or less of their time during the month(s) referenced above on FEA or activities in connection with a Federal election. If this is not the case, any reimbursement from your committee's non-federal account for this payment is not permissible and must be returned. Although the Commission may take further legal action

OHIO REPUBLICAN PARTY STATE CENTRAL & EXECUTIVE COMMITTEE

Page 3 of 4

regarding any improper allocation activity, your prompt action will be taken into consideration.

7. Schedule H4, supporting Line 21(a), of your report discloses \$5,611.70 in payments for "COMPLIANCE CONSULTING-NOT CANDIDATE SPECIFIC" to individuals. Please clarify whether these individuals are employees of your committee. If they are employees, please clarify whether this activity is for employees who spent 25% or less of their time during the month(s) referenced above on Federal Election Activity (FEA) or activities in connection with a Federal election. You are advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on FEA or activities in connection with a Federal election must not be allocated between or among federal, non-federal and Levin accounts. Rather, only federal funds may be used.

Any reimbursement from your committee's non-federal or Levin account for salary and wage payments for employees who spent more than 25% of their compensated time in a given month on FEA is not permissible and must be returned. Please provide clarification regarding these payments.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1177.

OHIO REPUBLICAN PARTY STATE CENTRAL & EXECUTIVE COMMITTEE

Page 4 of 4

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Jones". The signature is fluid and cursive, with a long horizontal line extending from the end.

Brian Jones  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

321